

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

**EDWARD J. KOELLER, individually and on)
behalf of all others similarly situated,)**

Plaintiff,)

v.)

Case No.: 4:21-cv-540-HEA

RISK BASED SECURITY, INC.,)

Defendant.)

NOTICE OF SETTLEMENT

COMES NOW Defendant Risk Based Security, Inc. (“RBS”), through its undersigned counsel, and hereby notifies the Court that the parties have reached a settlement of all claims in the above-captioned lawsuit.

Based on this settlement, RBS respectfully requests the Court to grant the Parties thirty (30) days in which to finalize the settlement, after which the Parties will file a Stipulation for Dismissal with the Court under FED. R. CIV. P. 41(a)(1)(A)(ii) dismissing this action and asking the Court to retain jurisdiction to enforce the terms of their settlement agreement under the authority of Kokkonen v. Guardian Life Ins. Co. of America, 511 U.S. 375, 381-82 (1994).

Respectfully submitted,

Dated: October 25, 2021

GREENSFELDER, HEMKER & GALE, P.C.

By: /s/ Mary Ann L. Wymore
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Attorneys for Defendant Risk Based Security, Inc.

CERTIFICATE OF SERVICE

The undersigned certifies that on this 25th day of October, 2021, a true and correct copy of the foregoing was filed with the Clerk of the Court to be served by operation of the Court's electronic filing system on all attorneys of record.

/s/ Mary Ann L. Wymore